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*Attorney for Maurice Williamson*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
MAURICE WILLIAMSON,  
  
Defendant.

CASE NO. 2:21-CR-00129-APG-EJY

STIPULATION TO CONTINUE  
SENTENCING (Fourth request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney for the District of Nevada, and Joshua Brister, Assistant United States Attorney, and Jacqueline Tirinnanzi, counsel for Defendant Maurice Williamson, that the sentencing hearing currently scheduled for October 5, 2023, at 11:00 a.m. (ECF No. 96) is continued for no sooner than 21 days, to a date and time convenient to this Court. This stipulation is made and based upon the following:

1. Mr. Williamson entered a change of plea on October 20, 2022, pleading guilty to one count of Felon in Possession of a Firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2). ECF No. 65.

2. For the duration of his case, Mr. Williamson was on pretrial release and has been fully compliant with the conditions of his release. ECF No. 12.
3. This Court is aware of the December 2022 medical diagnosis of Mr. Williamson Jr. (a co-defendant and Mr. Williamson's son). Mr. Williamson requests additional time to visit his son prior to a potential custodial sentence.
4. Mr. Williamson notified defense counsel in June 2023 that his elderly mother is in declining health and that he requires the opportunity to visit her and assist her in preparing end-of-life arrangements, prior to his potential custodial sentence.
5. Due to the challenging and unfortunate circumstances that Mr. Williamson and the Williamson family have been enduring, additional time was requested for Mr. Williamson's sentencing memorandum and hearing.
6. At this time, counsel anticipates scheduling conflicts in early October and respectfully requests a 21-day continuance to ensure counsel will be present in the jurisdiction.
7. Mr. Williamson does not oppose the continuance request and is not in custody.
8. This is the fourth request for a continuance of the sentencing hearing.
9. No further requests are anticipated.
10. The additional time requested herein is sought in good faith and not for purposes of delay.
11. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that the "court may, for good cause, change any time limits prescribed [for sentencing] in this rule." Furthermore, a delay in sentencing does not implicate or undermine the defendant's speedy trial rights

1 under the United States Constitution, which terminated upon conviction. *See*  
2 *Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).

3 12. Denial of this request for continuance would deny counsel for Mr. Williamson  
4 sufficient time to effectively and thoroughly prepare for sentencing, taking into  
5 account due diligence. Accordingly, a denial of this request for continuance could  
6 result in a miscarriage of justice.  
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9 Dated this 26th day of September 2023.  
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12 /s/Joshua Brister  
13 Assistant U.S. Attorney  
14 Counsel for the United States  
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/s/Jacqueline Tirinnanzi  
Counsel for Maurice Williamson

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**FINDINGS OF FACT, CONCLUSIONS OF  
LAW, AND ORDER**

**FINDINGS OF FACT**

Based on the pending stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Mr. Williamson entered a change of plea on October 20, 2022, pleading guilty to one count of Felon in Possession of a Firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2). ECF No. 65.
2. For the duration of his case, Mr. Williamson was on pretrial release and has been fully compliant with the conditions of his release. ECF No. 12.
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Williamson family have been enduring, additional time was requested for Mr. Williamson's sentencing memorandum and hearing.

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8. This is the fourth request for a continuance of the sentencing hearing.

9. No further requests are anticipated.

10. The additional time requested herein is sought in good faith and not for purposes of delay.

11. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that the "court may, for good cause, change any time limits prescribed [for sentencing] in this rule." Furthermore, a delay in sentencing does not implicate or undermine the defendant's speedy trial rights under the United States Constitution, which terminated upon conviction. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).

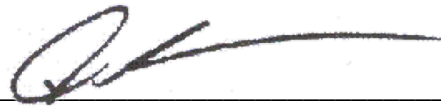
12. Denial of this request for continuance would deny counsel for Mr. Williamson sufficient time to effectively and thoroughly prepare for sentencing, taking into account due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

**ORDER**

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that Mr. Williamson's sentencing hearing currently scheduled for October 5, 2023, at 11:00 a.m., be VACATED.

IT IS FURTHER ORDERED that the sentencing hearing is reset for November 2, 2023 at the hour of 1:30 p.m. in Courtroom 6C before Judge Andrew P. Gordon.

DATED: September 27, 2023

  
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THE HONORABLE ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE